UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UTHEAST FLOATING DOC

Plaintiff,

v.

CIVIL ACTION

AGM MARINE CONTRACTORS, INC., CHILDS ENGINEERING CORPORATION and THE TOWN OF PROVINCETOWN,

05-11039 EFH

Defendant.

MOTION FOR THE ADMISSION PRO HAC VICE OF ROSEMARY H. HAYES AND TINA L. CARABALLO AS COUNSEL FOR PLAINTIFF

Pursuant to Local Rule 83.5.3, the undersigned counsel, David G. Hanrahan, a member of good standing of the bar of the United States District Court for the District of Massachusetts, moves that Rosemary H. Hayes, Esq. and Tina L. Caraballo, both of the bar United States District Court for the Middle District of Florida be admitted in this action pro hac vice as counsel for Plaintiff Southeast Floating Docks, Inc. In support of this Motion, Attorneys Hayes and Caraballo file and attach hereto their Certifications under Local Rule 83.5.3. Attorneys Hayes and Caraballo are national counsel to the Plaintiff, representing it in the underlying arbitration proceeding, and thus, participation in this matter will advance the process, reduce the cost of this action to the plaintiff and serve the interest of justice.

Respectfully submitted, SOUTHEAST FLOATING DOCKS, INC., By its attorneys,

David G. Hanrahan, Esq. (BBO # 220580)
Richard D. Vetstein, Esq. (BBO # 637681)
GILMAN, MCLAUGHLIN & HANRAHAN, LLP
P.O. Box 9601

Boston, Massachusetts 02114-9601

Telephone: 617-227-9999 Facsimile: 617-227-7177

Dated: May 18, 2005

Local Rule 7.1 Certification

The undersigned certifies that since this motion is filed simultaneously with the filing of the complaint and the defendants have not answered the complaint, it is impossible to attempt to confer regarding the issues raised by this motion.

Park Wash Hav David G. Hanrahan, Esq. AO 136 (Rev. 9/98) Certificate of Good Standing

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

6500 11089 EFH

CERTIFICATE OF GOOD STANDING

I, SHERYL L. LOESCH, Clerk of this Court, certify that

Tina L. Caraballo, Bar #0164275

was duly admitted to practice in this Court on

May 18, 1999

and is in good standing as a member of the Bar of this Court.

Dated at Orlando, Florida, on May 17, 2005.

SHERYL L. LOESCH

Clerk

I. Cammarota, Deputy Clerk

05 CV 1/039 EFH

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SOUTHEAST FLOATING DOCKS, INC.,

Plaintiff,

CIVIL ACTION NO.:

ν.

AGM MARINE CONTRACTORS, INC., CHILDS ENGINEERING CORPORATION and THE TOWN OF PROVINCETOWN,

Defendant.

CERTIFICATE IN SUPPORT OF MOTION TO APPEAR PRO HAC VICE-ROSEMARY H. HAYES

Pursuant to LR. 83.5.3, Rosemary H. Hayes moves for leave to appear before this Court in the above styled case on behalf of the Plaintiff. Rosemary H. Hayes is a member of the bar of the United States District Court for the Middle District of Florida and a certificate of good standing is attached hereto. She further certifies the following:

- She is a member of the bar in good standing in every jurisdiction where she has been admitted to practice.
- There are no disciplinary proceedings pending against 2. her as a member of the bar in any jurisdiction.
- She is familiar with the Local Rules of the United 3. States District Court for the District of Massachusetts.

- 4. My application for leave to practice in this Court is on motion of a member of the bar of this Court, who filed an appearance.
- 5. A certificate of good standing from the United States
 District Court for the Middle District of Florida is
 attached.

Rosemary H. Hayes

Florida Bar No.: 549509 Hayes & Caraballo, P.L. Post Office Box 547248 Orlando, Florida 32854

Telephone: 407-649-9974
Facsimile: 407-649-9379
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

05-1103 9EF14

CERTIFICATE OF GOOD STANDING

I, SHERYL L. LOESCH, Clerk of this Court, certify that

Rosemary Hanna Hayes, Bar #0549509

was duly admitted to practice in this Court on

October 28, 1986

and is in good standing as a member of the Bar of this Court.

Dated at Orlando, Florida, on May 17, 2005.

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SOUTHEAST FLOATING DOCKS, INC.,

Plaintiff,

CIVIL ACTION NO.:

v.

*

AGM MARINE CONTRACTORS, INC., CHILDS ENGINEERING CORPORATION and THE TOWN OF PROVINCETOWN,

05 CV11039 EFX

Defendant.

CERTIFICATE IN SUPPORT OF MOTION TO APPEAR PRO HAC VICE-TINA L. CARABALLO

Pursuant to LR. 83.5.3, Tina L. Caraballo moves for leave to appear before this Court in the above styled case on behalf of the Plaintiff. Tina L. Caraballo is a member of the bar of the United States District Court for the Middle District of Florida and a certificate of good standing is attached hereto. She further certifies the following:

- 1. She is a member of the bar in good standing in every jurisdiction where she has been admitted to practice.
- 2. There are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction.
- 3. She is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

- 4. My application for leave to practice in this Court is on motion of a member of the bar of this Court, who filed an appearance.
- 5. A certificate of good standing from the United States District Court for the Middle District of Florida is attached.

Tina L. Caraballo

Florida Bar No.: 0164275 Hayes & Caraballo, P.L. Post Office Box 547248 Orlando, Florida 32854

Telephone: 407-649-9974 Facsimile: 407-649-9379 Attorneys for Plaintiff